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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

IN RE META PIXEL TAX FILING CASES

Case No. 5:22-cv-07557-PCP (VKD)

**[PROPOSED] ORDER GRANTING
DEFENDANT'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

This Document Relates To:

Hon. P. Casey Pitts

All Actions

Having considered the Administrative Motion to File under Seal and the Declaration of Lauren R. Goldman, filed by Meta Platforms, Inc. on October 27, 2025, pursuant to Civil Local Rule 79-5, all materials submitted in support thereof, and other records on file, and having found that good cause exists for the sealing of the documents listed below:

IT IS HEREBY ORDERED that parts of the Opposition to the Motion to Certify a Class and its exhibits (“Opposition and Exhibits”), which were filed on October 27, 2025 be **SEALED** as outlined below. Accordingly, the public shall only have access to the version of the Opposition and Exhibits:

Document	Portions of Document to Be Sealed	Designating Party	Reason for Redaction
Defendant Meta Platforms, Inc.’s Opposition to Plaintiffs’ Motion for Class Certification	Parts of page 4, lines 18-19, 21-23; page 6, lines 6, 8-10; page 14, line 5; page 15, line 1; page 22, lines 12-15; page 24, line 2.	Meta	This text should be redacted because it reveals specific, non-public information about Meta’s proprietary data storage systems, including the descriptions of the contents of a specific Hive table and how the systems can be queried. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta’s systems.
Exhibit 12 to the Declaration of Abigail A. Barrera	Sealed in full.	Meta	This exhibit should be sealed in full because it contains discussion of event data including specific field names and descriptions of those fields—which is proprietary, commercially sensitive, and confidential. Public disclosure of that information—including the specific way that Meta processes, organizes, and stores event data—would place Meta at a competitive disadvantage and could allow bad actors to undermine the integrity of Meta’s systems.

Exhibit 13 to the Declaration of Abigail A. Barrera	Sealed in full.	Meta	This exhibit should be sealed in full because it contains discussion of event data including specific field names and descriptions of those fields—which is proprietary, commercially sensitive, and confidential. Public disclosure of that information—including the specific way that Meta processes, organizes, and stores event data—would place Meta at a competitive disadvantage and could allow bad actors to undermine the integrity of Meta’s systems.
Declaration of Tobias Wooldridge	Parts of page 4, lines 1-6, 8-11, 13-17, 23	Meta	This text should be redacted because it reveals specific, non-public information about Meta’s proprietary data storage systems, including the names of specific Hive tables. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta’s systems.
Rebuttal Expert Report of Georgios Zervas, PhD	Parts of page I, heading IV(A)(1); page 4, footnote 6; page 7, paragraph 12(a)(i); page 27, footnotes 90-93; page 28, figure 4, paragraph 36, footnotes 93-95; page 29, paragraphs 36-37, footnotes 96-98; page 30, paragraphs 37-39, footnotes 99-101; page 31, paragraph 39, footnotes 102-104; page 32 footnotes 105-107; page 33, footnotes 107-108; page 34 ,paragraph 42, figures 5-6, footnote 110; page 38, footnote 118; page 39, paragraphs 46-47, footnotes 122, 126-127, 129; page 40, paragraphs 47, heading A(1), paragraph 48; page 41, paragraphs 51-51, footnote	Meta	This text should be redacted because it reveals specific, non-public information about Meta’s proprietary data storage systems (including the names of specific Hive tables), integrity systems (including how the systems work and how they were developed and detailed information about Meta’s finance-related filter), and highly confidential Source Code. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta’s systems.

	135; page 42, paragraphs 53-54; page 43, paragraph 57, footnote 140; page 44, paragraphs 57, 141; page 48, paragraph 63, footnote 158; page 50, paragraph 67; page 51, paragraphs 67-68, footnotes 167-169; page 53, footnote 176; page 55, paragraph 78, footnotes 186-187; page 56, paragraphs 78-79; page 57, paragraph 80, footnote 197; page 72, footnote 237; page 84, paragraph 266; page 85, figure 28; page 87, paragraph 112, footnote 273; page 95, footnote 297; page 97, paragraph 123, footnotes 300-302; page 98, paragraph 123.		
Appendix to the Rebuttal Expert Report of Georgios Zervas, PhD	Parts of page D-14, paragraphs 21-23, footnotes 27-29	Meta	This text should be redacted because it reveals specific, non-public information about highly confidential Source Code, including how the Source Code can be queried. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.
Rebuttal Report of Steven Tadelis	Parts of page I, headings IV, IV(B); page 4, paragraph 11, footnote 13; page 5, paragraph 13; page 6, paragraph 16; page 7, paragraph 16, heading IV, paragraph 17, footnotes 23-24; page 11, heading IV(B), paragraphs 23-24, footnote 34; page 12, paragraphs 25, 27; page 13, figure 2, note, source; page 14, figure 3, note, source, paragraph 28; page 15, paragraphs 28-29, footnotes 40-41.	Meta	This text should be redacted because it reveals specific, non-public information about Meta's proprietary data storage systems, including the names of specific Hive tables and fields, descriptions of the contents of those Hive table fields, the amount of data in Meta's systems, and how the systems can be queried. If this information were disclosed, it would competitively harm Meta and allow bad actors to

			undermine the integrity of Meta's systems.
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Dated: _____

P. Casey Pitts
United States District Court Judge